

1 **LAW OFFICES OF JOHNNY L. GRIFFIN III**
2 **JOHNNY L. GRIFFIN, III (SBN 118694)**
3 **SILKY SAHNAN (SBN 242850)**
4 1010 F Street, Suite 200
5 Sacramento, California 95814
Telephone: (916) 444-5557
Facsimile: (916) 444-5558
Attorneys for Defendant
MICHAEL L. STEVENS

6
7 **UNITED STATES DISTRICT COURT**
8 **EASTERN DISTRICT OF CALIFORNIA**

9 THE UNITED STATES OF AMERICA) Case No. CR S-04-289-WBS
10 Plaintiff,)
11 vs.) **STIPULATION AND [PROPOSED]**
12 MICHAEL L. STEVENS,) **ORDER TO CONTINUE JUDGEMENT**
13 Defendant.) **AND SENTENCING, HEARING ON**
14) **DEFENDANT'S BRIEF, AND MODIFIED**
15) **BRIEFING SCHEDULE**
16)
17) Date: May 29, 2007
18) Time: 9:30 a.m.
19) Court: Hon. William B. Shubb.
20)
21)
22)
23)
24)

25
16 Defendant MICHAEL L. STEVENS, by and through his attorney, Johnny L.
17 Griffin, III, and the United States of America, by and through Assistant U.S. Attorney
18 Matthew D. Segal, hereby agree and stipulate to continue the judgment and sentencing and
19 hearing on Defendant's Brief regarding the adverse consequences of the 100-to1 ratio
20 disparity between cocaine base and powder cocaine, in the above captioned case from
21 April 2, 2007 to May 29, 2007¹. This continuance is necessary to allow counsel for
22 Defendant additional time to review and discuss discovery with his client, and draft and
23 file the Memorandum of Points and Authorities in Support of Defendant's Brief.
24

25
1 ¹ The parties have been advised by this Court's Clerk May 29, 2007 at 9:30 a.m. is an available date and time for
sentencing and a hearing on this matter.

1 The parties have agreed to adhere to the following modified briefing schedule:²

2 <u>Pleading</u>	3 <u>Filing Deadline</u>
4 Defendant's Brief	5 04/23/07
6 Government's Opposition	7 05/07/07
Opposition	8 05/14/07

9 Dated: March 28, 2007

10 Respectfully submitted,

11 /s/ Johnny L. Griffin, III
12 JOHNNY L. GRIFFIN, III
13 Attorney for MICHAEL STEVENS

14 Dated: March 28, 2007

15 Respectfully submitted,

16 /s/ Matthew D. Segal
17 MATTHEW D. SEGAL³
18 Assistant United States Attorney

19 ORDER

20 Based on these findings and pursuant to the stipulation of the parties, the Court
21 hereby adopts the stipulation of the parties in its entirety as its order.

22 **IT IS SO ORDERED.**

23 Dated: March 28, 2007

24 
25 WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

26
27 ² The United States Government, by stipulating to the briefing schedule is not waiving the argument that the
28 defendant's brief is itself a breach of the plea agreement.

29
30 ³ Assistant United States Attorney Matthew D. Segal telephonically authorized attorney Johnny L. Griffin, III to
31 sign this Stipulation and Order on his behalf.